

JASON MOORE

V

Nstar Electric & Gas Co.

complaint

I JASON MOORE was wrongfully terminated from Nstar Electric and Gas Co. because of my disability which I sustained while working on the job.

Parties

I the plaintiff JASON MOORE resides at 35 Lindsey Street, Dorchester, Ma, 02124

The defendant (the employer) Nstar Electric and Gas Company is located at 1 Nstarway Westwood, Ma, 02090.

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
NOV 25 2015

Facts

- 1) I was employed at ~~A~~star Electric for four years as a Lineman. Prior to my employment at Nstar I was accepted into their two year program before being employed permanently in 2006.
- 2) On September 29, 2010 while training for the international lineman rodeo I fell off a 40 foot pole.
- 3) I was med-flight to Brigham & women hospital where they performed emergency surgery. I suffered a broken tibia and fibula of the left foot
- 4) Along with the physical injury I suffered with PTSD as a direct result from my accident

- 5) After being released from Brigham and women hospital I was transported to Spaulding hospital where I learned to walk and deal with my limitations and PTSD.
- 6) The psychologist at Brigham and women informed Nstar through email that I am suffering from PTSD and severe depression and recommended ~~that~~ I do not return to work until further notice.
- 7) I was examined by two doctors who evaluated the extent of my injuries and whether I can return to Nstar and perform the duties as a lineman. Both private and court (workman comp.) appointed doctor said that I will not be able to return to work as a lineman because of my physical limitations.

- 8) One December 14, 2010 Nstar terminated me claiming that I broke work rules
- 9) Nstar Having all information at hand of my limitations and inability to perform my previous job as a line man decided to terminate me
- 10) Nstar has had a past practice of offering injured employee a different position that accommodate their illness or limitations
- 11) After my termination I still had to have surgery to help rectify my limitation. The last surgery was performed in 2013.

I am whereby kindly asking the courts to have the defendant pay me lost of wages, pain and suffering I suffer, lost of benefits and for breaking the American disabilities act by wrongful termination me. The damages that I have incur is in excess of \$75,000.00 and what the court seems fit a a compensation value.

Jason Moore
35 Lindsey St
Dorchester, Ma, 02124